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*Attorneys for Defendant Imerys Talc America Inc. ("Imerys")*

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

Kandy Brooks-Hilliard and Charles Hilliard,

Plaintiff,

v.

JOHNSON & JOHNSON; JOHNSON &  
JOHNSON CONSUMER COMPANIES INC.;  
IMERYS TALC AMERICA, INC., JOHN  
DOES/JANE DOES 1-30 and UNKNOWN  
BUSINESSES AND/OR  
CORPORATIONS A-Z.

Defendants.

MDL No. 2738

**Civil Action No. 3:17-cv-11737(FLW) (LHG)**

**NOTICE OF APPEARANCE**

*Document Filed Electronically*

PLEASE TAKE NOTICE that Lorna A. Dotro, Esq. of Coughlin Duffy LLP hereby enters her appearance in this action as counsel for Defendant Imerys Talc America, Inc., ("Imerys").

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance shall be deemed a denial of all allegations in Plaintiff's Short Form Complaint. Imerys hereby adopts its Master Long Form Answer in its entirety in response to this Complaint.

Respectfully submitted,

s/ Lorna A. Dotro

Lorna A. Dotro

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*Attorneys for Defendant Imerys Talc America Inc.,*

Dated: December 13, 2017